

## **REMARKS/ARGUMENTS**

Applicant thanks Examiner for the detailed Office Action dated March 22, 2006. In response to the issues raised, the Applicant offers the following submissions and amendments.

### **Amendments**

Claim 1 has been amended to clarify that the auxiliary assembly performs at least three functions for the printhead, those three minimum functions being capping, blotting and the provision of a printing platen.

Accordingly, the amendments do not add any new matter.

### **Non-Statutory Double Patenting**

We trust the enclosed Terminal Disclaimer to co-pending application USSN 11/014717 addresses this issue.

### **35 U.S.C. §102 - Claim 1**

Claim 1 stands rejected for lack of novelty in light of US 5,572,245 to Cowger.

Amended claim 1 highlights that cartridge has an assembly auxiliary to the printhead can perform three or more functions, and those functions must include blotting, capping and the provision of a printing platen. The amendments clarify that the assembly should be capable of all three functions rather than any one of those functions.

In contrast, the Cowger pen has a protective cover 212 that performs only one of the above functions. Accordingly, the cited reference fails to anticipate the invention as defined by amended claim 1.

### **35 U.S.C. §103 - Claims 3 to 7**

Claim 3 stands rejected as obvious in light of Cowger in view of Bork et al. Similarly, claims 4 to 6 stand rejected as obvious in light of Cowger in view of Bork et al, in further view of US 6,318,920 to Silverbrook. Claim 7 stands rejected as obvious in light of Cowger in view of US 6,135,586 to McClelland.

As discussed above, Cowger fails to teach a cartridge with an auxiliary assembly that can blot, cap and provide a printing platen. Accordingly, these references can not support a §103 rejection of claim 3.

The '920 reference shows a maintenance station for an inkjet printhead that can blot, cap and provide a printing platen. However, this is permanently mounted within the printer and not part of the replaceable printer cartridge. To combine Cowger with '920 to provide a cartridge with a reciprocating, multi-functional assembly that blots, caps and provides the printing platen requires substantial re-designing and changes to the basic principles of operation in both Cowger and '920. Cowger cartridges would no longer be installed adjacent the paper path but into the paper path – the platen becoming one of the guides defining the path of the paper. Likewise, Cowger and Bork do not provide the ordinary

worker with the teachings to modify the '920 print engine into a removable cartridge. As a cartridge, the '920 print engine would need interfaces for receiving power and data as well as the mechanical power necessary to operate a reciprocating and rotating auxiliary assembly.

We submit that the ordinary worker would not be motivated to derive the invention defined by any of claims 4 to 6 from a combination of Cowger, Bork and '920, as there would be no reasonable expectation of successfully altering the basic operation of each device. Accordingly, claims 4 to 6 are not obvious in light of the cited references.

Pursuant to the above, the combined disclosures of Cowger and McClelland do not teach all the elements of claim 7. It follows that they also fail to support a §103 rejection.

It is respectfully submitted that the Examiner's rejections have been successfully traversed and the application is now in condition for allowance. Accordingly, favorable reconsideration is courteously solicited.

Very respectfully,  
Applicant:



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